

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE THE APPLICATION OF HORNBEAM  
CORPORATION

REQUEST FOR DISCOVERY PURSUANT  
TO 28 USC § 1782

Civ. No. 14 Misc. 424 (VSB)

**NOTICE OF MOTION TO INTERVENE AND AMEND THE  
COURT'S PROTECTIVE ORDER TO PERMIT THE USE OF DISCOVERY**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the May 30, 2017 Declaration of David R. Michaeli, the May 30, 2017 Declaration of Brian Doctor QC, and the exhibits thereto, and upon all of the pleadings and proceedings heretofore had herein, Vadim Shulman ("**Shulman**"), Bracha Foundation ("**Bracha**") and Hornbeam Corporation ("**Hornbeam**"), by and through counsel, will move this Court on a date and time as may be designated by the Court, at the United States Courthouse, 40 Foley Square, New York, NY 10007, for an order permitting Mr. Shulman's intervention and to amend the Court's Protective Order to permit Mr. Shulman to use discovery materials produced in this action in support of recently initiated foreign proceedings.

New York, New York  
May 30, 2017

HOGAN LOVELLS US LLP

By: /s/ David R. Michaeli

Dennis H. Tracey, III  
David R. Michaeli  
875 Third Avenue  
New York, NY 10022  
Telephone: (212) 918-3000  
Facsimile: (212) 918-3100  
dennis.tracey@hoganlovells.com  
david.michaeli@hoganlovells.com

*Attorneys for Hornbeam Corporation, Bracha  
Foundation and Vadim Shulman*